

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

ANITA BEAUFORD, for herself and others
similarly situated,

Plaintiff,

v.

THE JOHNS HOPKINS HOSPITAL, INC., THE
JOHNS HOPKINS HEALTH SYSTEM
CORPORATION, and THE JOHNS HOPKINS
UNIVERSITY,

Defendants.

Case No. 1:23-cv-00660-JKB

MOTION TO REMAND

**ORAL ARGUMENT
REQUESTED**

MOTION TO REMAND

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiff Anita Beauford hereby moves before the Honorable Chief Judge James K. Bredar for an Order remanding this matter to the Circuit Court for Baltimore County, Maryland, for lack of subject matter jurisdiction.

This Motion is based on the following documents: (1) this Motion to Remand; (2) the accompanying Memorandum of Law, filed on March 31, 2023; and (3) any oral arguments to be made at the hearing on this Motion; and all the other papers, documents, or exhibits on file or to be filed in this action.

Dated: March 31, 2023

Respectfully submitted,

MANN & RISCH LLC

/s/ Nathaniel K. Risch
Nathaniel K. Risch (Fed. Bar No. 28764)
101 E. Chesapeake Ave., Ste. 403
Towson, MD 21286
Tel: (410) 929-5145
Fax: (410) 307-1007
E-Mail: nate@mannrisc.com

BURSOR & FISHER, P.A.
Joshua D. Arisohn*
Philip L. Fraietta*
888 Seventh Avenue
New York, NY 10019
Tel: (646) 837-7150
Fax: (212) 989-9163
E-Mail: jarisohn@bursor.com
pfraietta@bursor.com

BURSOR & FISHER, P.A.
Christopher R. Reilly*
701 Brickell Ave., Suite 1420
Miami, FL 33131-2800
Telephone: (305) 330-5512
Facsimile: (305) 676-9006
E-Mail: creilly@bursor.com

DRURY LEGAL, LLC
Scott R. Drury*
6 Carriage Lane
Highwood, Illinois 60040
Telephone: (312) 358-8225
E-Mail: scott@drurylegal.com

**Pro Hac Vice Application Forthcoming*

Attorneys for Plaintiff and the Putative Class